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7 *Co-Lead/Liaison Counsel for Plaintiffs*

8 UNITED STATES DISTRICT COURT  
9 DISTRICT OF ARIZONA

10 In Re Bard IVC Filters Products  
11 Liability Litigation

No. MD-15-02641-PHX-DGC

**MOTION TO AMEND CASE  
MANAGEMENT ORDER NO. 46**

**(Filed *Ex Parte*; Under Seal  
Expedited Consideration Requested)**

14 Plaintiffs' Co-Lead Counsel and Co-Chairs of the Common Benefit Fee and Cost  
15 Committee ("the Fee Committee") respectfully seek an amendment of Case Management  
16 Order No. 46 (Doc. 21480) ("CMO 46"). Upon the Fee Committee undertaking its work  
17 at the direction of the Co-Chairs and after consultation with the Special Master, it was  
18 agreed additional protocols are necessary. Therefore, Plaintiffs' Co-Lead Counsel and  
19 Co-Chairs of the Fee Committee hereby submit the attached proposed amended CMO 46.  
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1                   RESPECTFULLY SUBMITTED this 22<sup>nd</sup> day of June 2020.  
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3                   BEUS GILBERT MCGRODER PLLC

4                   By: /s/ Mark S. O'Connor

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13                  *Co-Lead/Liaison Counsel for Plaintiffs*  
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**CERTIFICATE OF SERVICE**

I hereby certify that on this 22nd day of June 2020, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing.

/s/ Jessica Gallentine